

PSJ3

Exhibit 282

From: Ducca, Anita
Sent: Tue 2/22/2011 5:41 AM (GMT -5)
To: ttwitty@hdsmith.com; geuson@hdsmith.com; dengel@keysourcemedical.com; bpine@smithdrug.com; steve.reardon@cardinalhealth.com; gary.hilliard@mckesson.com; dhoffman@keysourcemedical.com; Mone, Michael; Robert I. Brown
Cc: Kelly, Patrick; David Durkin; Ritter, Pam; Bellingham, Daniel
Bcc:
Subject: HDMA -- Materials for the March 1 RAC Meeting on DEA
Attachments: RAC Draft Agenda March 1 2011.doc; Final Draft DEA Compliance Questions for member review 02-22-11.DOC; DEA's Suggested Questions Prior to Shipping 10-20-09.pdf; Final ICG Nov. 13, 2008.pdf; DEA Letter to registrants on CS monitoring 09-27-06.pdf; DEA Letter to registrants on CS 02-07-07.pdf; DEA SO Letter to Registrants 12-27-07.pdf

Dear All,

This e-mail is in preparation for our face to face meeting on March 1. It is only being circulated to those who'll be attending the meeting in person. If there is someone else in your company who plans to attend but is not on the distribution list, please forward it to them and let me know. I don't have them on my roster. However, please do not circulate this outside of your company, as it's intended for HDMA distributor members only.

During the meeting, we'll brainstorm the compliance issues you're encountering when conducting suspicious orders monitoring efforts, and develop a thorough list of questions, to be submitted to DEA, about how to comply.

The attached materials are being provided ahead of the meeting so that you can confer internally with your colleagues if needed. They include:

- Draft Agenda (I'm still reviewing the timing and "other" issues, but it's mostly complete.)
- Draft questions for DEA. The questions that members sent to HDMA are on the left side of the chart, and a suggested rewrite is on the right. We rewrote them to direct DEA towards concrete answers and to avoid the standard/stock answers (e.g., "That's a business decision").
- DEA's suggested questions for wholesalers to ask prior to shipping
- The final HDMA Industry Compliance Guidelines
- DEA's 2006 & 2007 letters to wholesale distributor registrants

(Copies of these materials will also be available at HDMA on March 1)

The meeting will be in the nature of a “brainstorming” session to further develop questions for DEA. Would answers to these questions help your compliance efforts? Are some extraneous? Are there others that should be included? In a few places, we either had further questions for you about the author’s intent and/or suggest leaving them out. However, we’re open to discussion and revisions. A revised version will be e-mailed out for your final review.

So, the agenda calls for:

- Reviewing the chart of submitted questions and rewrites
- Review the questions DEA provided in 2009 (attached) to see if you want DEA to clarify how to handle responses to any of them. (Did you ever get answers from customers that you’d like DEA guidance on whether to ship?)
- Similarly, review the ICG, and DEA’s letters to registrants to see if they generate other clarification questions.
- Is there anything else, not on this list, that we should add?
- If we have time at the end, we’ll take up a few other Regulatory items, and I’ve also included a few minutes for Kristen Freitas to discuss PSE Federal issues.

The dress code is business casual .

If you have any questions, I’ll be in the office most of the week. I’ll be at an off site meeting on Friday, but accessible by e-mail.

I’m looking forward to our meeting on March 1.

Anita

Anita T. Ducca

Vice President, Regulatory Affairs

Healthcare Distribution Management Association (HDMA)

901 North Glebe Rd., Suite 1000

Arlington, VA 22203

(703) 885-0240

Fax: (703) 812-5282

e-mail: aducca@hdmanet.org

www.HealthcareDistribution.org

HDMA 2011 Distribution Management Conference and Technology Expo

Sunday, March 6–Wednesday, March 9, 2011

Tampa Marriott Waterside Hotel • Tampa, Fla.

Register by Friday, December 17, 2010 and be entered in an exclusive Early Bird Raffle for a chance to win an Apple iPad.

